RECLAIM Working Group Meeting

May 11, 2004

PAR 2015

Backstop Provisions



- Separate Board item to address breakdown emissions
- Ensure deadline is met for SIP approval of May 2001 RECLAIM changes
- Set Hearing May 2004
- Public Hearing June 2004



Proposed Amendments

- Element of annual audit
- Compare to unused RTCs for compliance year
- Subtract from unused RTCs and any remaining RTCs deducted:
 - Option A: proportionally from each facility with breakdown emissions (staff proposal)
 - Option B: from all RTC holdings based on equal percentage

BARCT Determinations and Cost Effectiveness

Categories with No New BARCT

- Curing and Drying Ovens
- Glass Melting Furnaces
- ICEs
- Cement Kilns
- Turbines (Rule 1134)
- Afterburners
- Rule 219 Exempt Equipment (Except R1146.2 Boilers)

Potential RTC Reductions

Potential RTC Reductions, tpd

Methodology

	Allocation A(1)	Allocation B ⁽²⁾	AQMP ⁽³⁾
Total RTC Holdings	34.2	34.2	34.2
Remaining Emissions	28.2	23.1	24.3
Potential 10%	2.8	2.3	2.4
Potential Reductions	6.0	11.1	9.9
w/10%	3.2	8.8	7.5

- 1) Peak Year and New BARCT
- 2) Peak Year and Lower of New BARCT or 2000 Emission Factor Reduced 27%
- 3) 1997 Base Year x Growth x New BARCTI



Options for Reduction Timing

- 1 Step or 2 Phases
- 2 Phase Approach
 - Adopt Reductions from Both Phases
 - Submit Phase I to SIP
 - Do Not Submit Phase II to SIP Until Re-Evaluation

Options

- 100% by 2010
- 50% by 2008 and Remainder by 2010
- 2/3 by 2010 and Remainder by 2013
- Other

Proposed Criteria for Facilities That Will Get No Reduction

- New Facility After 1994
- All Equipment at BACT
- All Equipment at BARCT
- Have Not Sold RTCs Ever
- Have Not Sold RTCs for CY 2003 or Later

Comments on Draft Rule Language

Schedule

- Next Working Group meeting
 June 1, 2004 1:00 p.m. Conf. Rm. GB
 (tentative)
- Public Hearing for PAR 2015June 4, 2004